REMARKS

In view of the following remarks and the foregoing amendments, reconsideration and allowance are respectfully requested.

Claims 1-35 were pending at the time of this action.

Claims 1-4, 12, 12 and 26-29 stand rejected under 35 U.S.C. 102(e) as allegedly being anticipated by D'Arlach et al. (US Patent No. 6,026,433). Claims 5, 14 and 30 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over D'Arlach in view of Evans, III (US Patent No. 5,732,231). Claims 6, 8-10, 15-17, 19-21, 23, 25 and 31-34 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over D'Arlach in view of Kobayakawa et al. (US Patent No. 6,119,078). Claims 7, 11, 18 and stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over D'Arlach in view of Dan (US Patent No. 6,560,639). Claim 22 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over D'Arlach and Kobayakawa further in view of Evans, III (US Patent No. 5,732,231). Claim 24 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over D'Arlach and Kobayakawa further in view of Dan (US Patent No. 6,560,639). The foregoing contentions are respectfully traversed.

Claims 1, 3-4, 6-7, 9, 11-18, 26-29, 31-32, and 35 are hereby cancelled without prejudice. Claims 2, 5, 8, 30, 33 are currently amended. Claims 36-39 are currently added. Therefore, claims 2, 5, 8, 10, 19-25, 30, 33, 34, 36-39 are now pending, with claims 8, 19, 30, and 36 being independent.

Applicants graciously thank the Examiner for the 03/01/05 interview granted to Applicants' representatives. The pending rejections in this matter were discussed, but no formal agreement was reached.

35 U.S.C. 102 Rejections – Claims 1-4, 12, 13, 26-29

Claims 1-4, 12, 13, 26-29 are hereby cancelled without prejudice to place the remaining pending claims in condition for allowance.

35 U.S.C. 103 Rejections

Claims 8, 19, and 30

Claims 8, 19, and 30 are allowable at least because D'Arlach, Kobayakawa, and Evans, alone or in combination, do not teach or suggest each and every feature of the claims as recited in the claims. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art (MPEP 2143).

D'Arlach and Kobayakawa do not teach or suggest at least the feature of "dynamically" generating a web document in a second language as recited in the claims. For instance, D'Arlach discloses a method to create and edit a web site using customizable templates without requiring a user to know HTML or another web site-creating language (D'Arlach: Abstract, Summary). Kobayakawa discloses translating a web page in a first language by inputting a URL (Uniform Resource Locator) of the web page and interpreting the URL used to request the web page. The web page is downloaded, the URL string is interpreted, a database searches for a similar URL, and a translation environment is located for the URL. A user is then sent a translated web page with a URL that is similar to the transmitted URL. (Kobayakawa: Abstract, Summary, Col. 3, lines 19-31).

None of the references teach or suggest dynamically (e.g., real time) generating a user web document in a second spoken language using desired user variables from a linked prearranged document or form web document in a first spoken language. No new matter has been added. The specification supports the amendments to claims 8 and 30 (See specification, page 17, lines 21-22; page 20, lines 2-5, 13-23; page 21, lines 1-2, 3-6, 17-18). For example, "user web documents can be created in real time" (page 21, lines 3-5), and "the user document is automatically created based on the user variables, in real time" (page 17, lines 21-22). Because the cited references fail to teach or suggest this feature, the cited references fail to teach or suggest each and every feature of the claims. For at least this reason, the 35 U.S.C. 103 rejection is improper and should be respectfully withdrawn.

The 35 U.S.C. 103 rejection should also be withdrawn because there is no motivation to combine the references in the cited references (MPEP 2143). In Claim 30, for example, there is no motivation provided in the cited references to combine the automatically generated web document features of the claim based on desired user variables in a selected spoken language with the other features of the claim. The "mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination" (MPEP 2143). Furthermore, "the fact that the claimed invention is within the capabilities of one of ordinary skill in the art is not sufficient by itself to establish prima facie obviousness" (MPEP 2143).

The 35 U.S.C. 103 rejection is also improper because the methods described in Claim 8 and 19 use less steps that the suggested combination of the cited references for generating the web document in a second spoken language. Absence of a property which a claimed invention would have been expected to possess based on the teachings of the prior art is evidence of unobviousness. *Ex parte Mead Johnson & Co.* 227 USPQ 78 (Bd. Pat. App. & Inter. 1985). For example, Kobayakawa requires that there should be a first web document in a first language in order to generate a second web document in a second language (Kobayakawa: Abstract, Summary, Col. 3, lines 19-31). However, Claim 19 doesn't require a first web document in a first language to generate "said user web document ... generated in a second language".

For at least these reasons, the Applicants respectfully request withdrawal of the 35 U.S.C. 103 rejections to Claims 8, 19, and 30, and ask that those claims be placed in condition for allowance.

Claims 2, 5, 10, 20-25, 33-34

Claims 2, 5, 10, 20-25, 33-34 are all patentable for each depending on an allowable base claim, and for reciting patentable subject matter in their own right. Allowance of these dependent claims is respectfully requested.

Newly-Added Claims 36-39

Claims 36-39 are newly-added claims, which all recite subject matter from the disclosure. No new matter has been added.

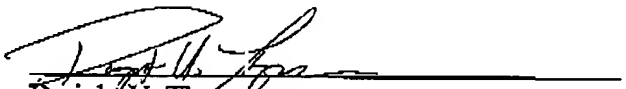
Conclusion

At least in view of the amendments and remarks herein, the Applicants believe that Claims 2, 5, 8, 10, 19-25, 30, 33, 34, 36-39 are in condition for allowance and ask that these pending claims be allowed. It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific issue or comment does not signify agreement with or concession of that issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

All of the pending claims are now in condition for allowance. A formal notice to that effect is respectfully solicited. Applicants respectfully request that all claims be allowed. No fee is believed to be due at this time. However, in the event any fees are due, the Commissioner is hereby authorized to charge any fees or credits to deposit account 06-1050.

Respectfully submitted,

Date: March 4, 2005



Dwight U. Thompson
Reg. No. 53,688

Fish & Richardson P.C.
12390 El Camino Real
San Diego, California 92130
Telephone: (858) 678-5070
Facsimile: (858) 678-5099

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